




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

From: Joe Lapka 
To: Permit file for Cabrillo Port

Date: September 8, 2006

Subject: Prevention of Significant Deterioration requirements

This is to document a telephone call with Audrey McCombs of the California Coastal Commission on the date of this memorandum. Ms. McCombs inquired about the general requirements of the PSD program without respect to any specific facility. I indicated that PSD requirements include such things as the application of BACT; the requirement to perform an ambient air quality analysis; and the requirement to analyze impacts to soil, vegetation, and visibility.

At the end of the call Ms. McCombs asked whether the modeling analysis performed by BHP met the requirements of a PSD modeling analysis. I indicated that it did not meet PSD requirements because the applicant did not conduct a full impact analysis when an overwater receptor in the modeling showed NO₂ impacts above the significant impact level.

I provided Ms. McCombs with a copy of the 1990 NSR Workshop Manual for further information regarding the PSD and nonattainment NSR programs.